



Wayne Skigen <wskigen@lbtldlaw.com>

Re: Weir/settlement agreement

1 message

Wayne Skigen <wskigen@lbtldlaw.com>

Mon, Feb 15, 2016 at 2:18 PM

To: Ralph Davis Law <ralph@ralphdavislaw.com>

Cc: "sam@mveslawyers.com" <sam@mveslawyers.com>

Attached is an execution copy of the settlement agreement in a .PDF file. Please secure your clients' signatures on it, as it reflects the parties' agreement; separate signed counterparts are fine. I've sent one to my client for his signatures in an individual capacity and on behalf of his corporation.

Wayne D. Skigen



Call our office for an appointment:

618-656-2321

314-877-8623

Lucco, Brown, Threlkeld & Dawson LLP

224 St. Louis Street

P.O. Box 539

Edwardsville, IL 62025

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On Mon, Feb 15, 2016 at 9:44 AM, Ralph Davis Law <ralph@ralphdavislaw.com> wrote:

Looks fine to me.

Ralph D. Davis
Ralph Davis Law
416 Main St.



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Peoria, IL 61602
309-676-7707 (phone)
309-676-7706 (fax)
309-264-0593 (mobile)
ralph@ralphdavislaw.com
www.ralphdavislaw.com

From: Wayne Skigen
Sent: Monday, February 15, 2016 9:40 AM
To: Ralph Davis Law; sam@mveslawyers.com
Subject: Re: Weir/settlement agreement

Understood, Ralph. I hope that your client comes around without our having to involve the court.

I can add a provision that reads as follows:

"Satisfaction of Liens and Responsibility to Providers.

Weir represents that there are no liens on any recovery he may obtain in connection with the Action and further acknowledges and agrees that he is solely responsible for satisfying any liens that may be asserted, or any claims from any providers, for legal, healthcare or other services that have been provided to him."

Sam, does this sufficiently address your concern?

Wayne D. Skigen



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On Mon, Feb 15, 2016 at 9:16 AM, Ralph Davis Law <ralph@ralphdavislaw.com> wrote:

Wayne,

This agreement looks fine.

There are no liens to this file, but you can put language in to protect yourself.

Mr. Weir has not signed the paperwork I have sent him. It looks like he will indeed renounce the agreement. However, as soon as this agreement is fully drafted, I will send it to him.

I will be out of the office for hearings and depositions in Champaign for the next two days and in depositions

on Thursday here. I am in the office all day today.

Ralph D. Davis
Ralph Davis Law
416 Main St.
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ralph@ralphdavislaw.com
www.ralphdavislaw.com

From: Wayne Skigen
Sent: Monday, February 15, 2016 7:51 AM
To: Ralph Davis; sam@mveslawyers.com
Subject: Weir/settlement agreement

Ralph/Sam,

Attached for your review is a draft of a settlement and release agreement. I have not yet run it by my clients; I first want to have it in a form meeting your approval before I obtain my clients' approval.

Sam, I think you mentioned a provision regarding plaintiffs' responsibility for satisfying any liens. If you want such a provision in this agreement, please supply some suggested language; or, if that is a separate document, why don't you circulate it for review.

Thanks.

Wayne D. Skigen



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Settlement and Release Agreement.pdf

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